

REMARKS

Pending Claims

Claims 37-64 have been canceled without prejudice or disclaimer and add new claims 65-80 have been added. Accordingly, claims 21-36 and 65-80 are pending.

IN THE SPECIFICATION

Applicants have amended the specification in accordance with the Examiner's requirement to avoid using the description "sets the structural information" on pages 5, 21, 35 and 36 of the specification. For example, on page 21, Applicants have replaced the expression with "transfers the structural information to the switch in order to store the structural information." The Applicants refer to page 21, line 8 to page 22, line 12, for support of the change. Similar changes have been made to pages 5, 35 and 36. For support of the changes to page 36, line 23, as another example, please see page 36, lines 18-20 of the specification.

**35 U.S.C. §112 AND CLAIM OBJECTIONS**

Applicants have amended the claims to overcome the claim objections and to overcome the 35 U.S.C. §112, second paragraph rejection.

**35 U.S.C. §§102 AND 103**

Claims 21-23 are rejected under 35 U.S.C. §102(b) as being anticipated by Matsunami et al, U.S. Patent No. 5,619,690 (Matsunami). Claim 26 has been rejected under 35 U.S.C. §103(a) as being unpatentable over Matsunami in view of Suruguuchi et al, U.S. Patent No. 6,098,119. In these rejections, the Microsoft Computer Dictionary definition of node is relied upon in interpreting Matsunami. Applicants request reconsideration of the rejections for the following reasons.

The Office Action relies upon Fig. 18 of Matsunami which shows plural storage systems, each including a disk controller 24 and disk unit group 36 that are coupled to a disk unit group switch 35. The disk unit group switch 35 is controlled by the disk unit group selector 34. Specifically, command management means 23 receives an access request from a host

computer via the interface controller 22, and if the access request is for writing a new logical block, the access request is transferred to the new file address determination means 26. Recorded in the local file management table 27 is the correspondence between the logical block address and the local block address. See Fig. 4 and column 7, lines 14-35 and column 8, lines 15-21 of the reference.

In Matsunami, the new file address determination means 26 refers to the local file management table 27 and disk management tables 25(b1), 25(b2) and 25(b3), each of which have configuration information of the corresponding disk unit group, and selects an appropriate disk unit group and the local block address for writing data according to the received access request. See column 8, lines 12-15 of the reference. In the selection step, the new file address determination means 26 considers transfer length, access frequency, the characteristic of the file, disk unit group characteristic and so forth. Then, the new file address determination means 26 informs the disk unit group selector 35 of the selected disk unit group and the disk unit group selector controls the disk unit group switch 35 according to the received information.

Then, the data is written in the selected new local blocks.  
See column 18, lines 1-16 of Matsunami.

As noted in Matsunami, the configuration information is not transmitted to the switch and plural storage systems from the management unit. The selected disk unit group is transmitted from the new file address determination means 26 to the disk unit group selector 34. However, the new file address determination means 26 does not correspond to the management unit and the disk unit group selector 34 does not correspond to the switch. Further, Matsunami does not disclose transmitting a selected disk unit group to each of the plural storage systems.

Also, in Matsunami, the switch and the plural storage systems are not configured to process and access requests according to the received configuration information. Further, the plural storage systems are not disclosed as being able to change their configuration according to the received configuration information in Matsunami. Accordingly, the Matsunami reference does not anticipate claims 21-23 and therefore the 35 U.S.C. §102 rejection should be withdrawn.

Suruguuchi is applied for disclosing automatically configuring disk drives connected to a RAID controller. The reference does not disclose coupling plural storage systems to a switch or the coupling of a management unit to the switch and the plural storage systems. Accordingly, the combination of Matsunami and Suruguuchi is insufficient to render the invention set forth in claim 26 unpatentable under 35 U.S.C. §103.

**New Claims**

Applicants have new claims 65-80, which are method claims of the invention. These claims are similar to claims 21-36 and therefore should be found to be allowable for the same reasons.

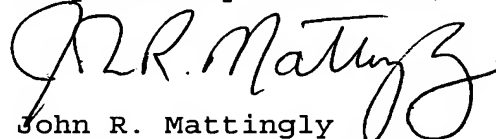
Amendment  
Serial No. 10/769,922

H-876-05

Conclusion

In view of the foregoing amendments and remarks,  
Applicants request reconsideration and reexamination.

Respectfully submitted,



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